Southern Nuclear

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.6.09.06 [Index Number 647]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.06 [Index Number 647]. This ITAAC confirms that the vehicle barrier system will protect against the Design Basis Threat vehicle bombs based upon the stand-off distance of the system. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.06 [Index Number 647]

JMC/CIP/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0504
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.06 [Index Number 647]

ITAAC Statement

Design Commitment

6. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.

Inspections/Tests/Analyses

Inspections and analysis will be performed for the vehicle barrier system.

Acceptance Criteria

The vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.

ITAAC Determination Basis

Inspections and analysis of the vehicle barrier system (VBS, as defined by NUREG-2203) were performed to ensure the system is installed and located at the necessary stand-off distance to protect against the Design Basis Threat (DBT) vehicle bombs. The inspections and analysis confirmed the VBS will protect against the DBT vehicle bombs based upon the stand-off distance of the VBS and satisfy the applicable VBS stand-off distance requirements of the Vogtle Electric Generating Plant (VEGP) Units 1-4 Physical Security Plan associated with 10CFR 73.55(e)(10). The VEGP Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

The design, construction, and installation of the VBS is based upon analyses of the minimum safe stand-off distance (MSSD) required to provide adequate protection of the personnel, equipment, and systems necessary to prevent significant core damage and spent fuel pool sabotage against the effects of the DBT of radiological sabotage land vehicle bomb assault. The Unit 4 MSSD is established by standard plant analysis (Reference 1), as supplemented by site specific MSSD analyses (Reference 2). Site specific VBS analysis (Reference 3) and mobile bullet resistant enclosure (MBRE) blast analyses (Reference 4) provide additional analysis details which further demonstrate the requirements of 10CFR 73.55(e)(10) are met.

ITAAC Technical Report SV4-SES-ITR-800647 (Reference 5) documents the inspections and analyses performed to confirm the VBS is installed at stopping distances equal to or greater than the MSSDs established by analyses (References 1 through 4). The inspection also confirmed that the as-built VBS installation is consistent with the VBS design and installation analyses assumptions described in References 1 through 4.

The VBS DBT inspection and analysis results are documented in References 1 through 5 and confirm the vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the VBS.

References 1 through 5 are available for NRC inspection as part of the Unit 4 ITAAC 2.6.09.06 Completion Package (Reference 6).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.09.06 (Reference 6) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.06 was performed for VEGP Unit 4 and that the prescribed acceptance criteria was met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. APP-XV01-Z0C-001, AP1000 Vehicle Barrier System Standoff Distances for a Range of Blast Scenarios, Rev 0 (Safeguards Information)
2. ABS Consulting Calculation ID 4212670-C-103, VBIED Blast Effects Assessment of Security Assets, Rev 0 (Safeguards Information)
3. SV0-SES-Z0R-800000, Vogtle Plant Security System Vehicle Barrier System Analysis, Rev 1 (Safeguards Information)
4. Thornton Tomasetti Calculation ID SCAL-001, Kontek MBRE Blast Analyses, Rev 1 (Safeguards Information)
5. SV4-SES-ITR-800647, Unit 4 ITAAC 647 Vehicle Barrier System Inspection: ITAAC 2.6.09.06, Rev 0 (Security Related Information)
6. 2.6.09.06-U4-CP-Rev0, ITAAC Completion Package